

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: GENERIC DIGOXIN AND  
DOXYCYCLINE ANTITRUST  
LITIGATION

MDL NO. 2724  
16-MD-2724

HON. CYNTHIA M. RUFE

THIS DOCUMENT RELATES TO:

ALL ACTIONS

**DEFENDANT PAR PHARMACEUTICAL, INC.'S MOTION  
TO DISMISS DIRECT PURCHASER PLAINTIFFS'  
CONSOLIDATED AMENDED COMPLAINT AND END-PAYER  
PLAINTIFFS' CORRECTED CONSOLIDATED CLASS ACTION  
COMPLAINT**

Pursuant to Federal Rule of Civil Procedure 12(b)(6), defendant Par Pharmaceutical, Inc., respectfully moves this Court for an order dismissing with prejudice the Direct Purchaser Plaintiffs' Consolidated Amended Class Action Complaint and End-Payer Plaintiffs' Corrected Consolidated Class Action Complaint for failure to state a claim upon which relief may be granted. The grounds for this motion are set forth in the accompanying memorandum in support of this motion, Defendants' Memorandum of Law In Support Of Joint Motion To Dismiss Direct Purchaser Plaintiffs' Consolidated Amended Complaint, and Defendants' Joint Memorandum of Law In Support Of Their Motion To Dismiss End-Payer Plaintiffs' Corrected Consolidated Class Action Complaint.

Pursuant to Local Rule 7.1, accompanying this Motion is a memorandum in support of this Motion and a proposed order.

DATED: March 28, 2017

Respectfully submitted,

WILLIAMS & CONNOLLY LLP

By: /s/ John E. Schmidtlein

John E. Schmidtlein (admitted *pro hac vice*)

Sarah F. Teich (admitted *pro hac vice*)

725 Twelfth Street, N.W.

Washington, D.C. 20005

Telephone: (202) 434-5000

Facsimile: (202) 434-5029

jschmidtlein@wc.com

steich@wc.com

*Attorneys for Defendant Par Pharmaceutical,  
Inc.*